

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,

Defendants.

Civil Action No. 5:21-cv-844 (XR)
(consolidated cases)

UNITED STATES' OBJECTIONS TO STATE DEFENDANTS' EXHIBIT LIST

The United States hereby submits objections to State Defendants' exhibits. The United States utilized the following code in designating objections:

- **A:** Authenticity. The document is unsigned, undated, or has unidentified handwriting, or there is insufficient evidence to support a finding that the item is what the proponent claims it is. *See Fed. R. Evid. 901 & 902.*
- **H:** Hearsay. The document constitutes or contains hearsay, and no exception applies. *See Fed. R. Evid. 801 & 802.* With respect to expert reports, the United States has agreed to withdraw the objection so long as the expert testifies live or by trial deposition and adopts the statements in the report while under oath and subject to cross examination. With respect to other materials, the United States objects only insofar as the exhibit is offered for the truth of the matter asserted and not for the fact of a prior statement.
- **P:** Unduly Prejudicial. Any probative value is substantially outweighed by the danger of prejudice, delay, or needless presentation of cumulative evidence. *See Fed. R. Evid. 403.*
- **R:** Relevance. Not relevant to any issue to be decided. *See Fed. R. Evid. 401 & 402.*

The United States has identified where its exhibit list overlaps with that of State Defendants. Where the United States and State Defendants list documents that appear to be identical but were produced with distinct Bates numbers, the United States has provided the Bates range of its exhibit in the Notes column below. The United States has also listed exhibits that identify substantially similar documents but that are a non-exact match with a ~.

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
1	Signed and executed copy Senate Bill 1. https://webservices.sos.state.tx.us/legbills/files/C287/SB1.pdf		1		
2	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Eitan Hersh's February 10, 2023, Second Supplemental Report</i>			H	
3	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Eitan Hersh's February 28, 2022, Initial Report</i>			H, R	
4	Notice of Correction to March 29, 2022, Expert Report of Prof. Mark Hoekstra, Ph.D., Written in Response to the February 28, 2022, Report by Prof. Eitan Hersh			H, R	
5	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Christian Grose's February 10, 2023, Supplemental Report</i>			H	
6	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Christian Grose's February 28, 2022, Initial Report</i>			H	
7	Notice of Correction to March 29, 2022, Expert Report of Prof. Mark Hoekstra, Written in Response to the February 28, 2022, Report by Prof. Christian Grose.			H	
8	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Eric McDaniel's February 10, 2023, Second Supplemental Report</i>			H	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
9	Expert Witness Report, Prof. Mark Hoekstra, Response to Prof. Eric McDaniel's February 28, 2022, Initial Report			H	
10	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Kenneth R. Mayer's March 6, 2023, Supplemental Report</i>			H	
11	Notice of Correction to April 5, 2023, Expert Report of Prof. Mark Hoekstra, PhD, Written in Response to the March 6, 2023, Report by Prof. Kenneth Mayer			H	
12	Expert Witness Report, Dr. Stephen C. Graves			H	
13	Election Advisory No. 2021-18, Re: Revised: March 1, 2022, Primary Election and May 24, 2022, Primary Runoff Election Law Calendar, dated November 12, 2021	STATE097860-908			
14	Election Advisory No. 2021-21, Re: Legislative Summary - Second and Third Special Sessions, dated November 19, 2021	STATE001483-502			
15	Election Advisory No. 2021-23, Re: May 7, 2022, Election Law Calendar, dated December 10, 2021	STATE097909-48			
16	Election Advisory No. 2022-07, Re: NEW LAW: Changes to Early Voting by Personal Appearance - House Bill 2025, House Bill 3107, and Senate Bill 1, dated January 21, 2022	STATE001577-93			
17	Election Advisory No. 2022-08, Re: NEW LAW: Senate Bill 1 - Opportunity to Correct Defects on Application for a Ballot by Mail and Carrier Envelope, dated [January 28, 2022]	STATE034294-321	101		US exhibit at STATE019849-76

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
18	Election Advisory No. 2022-09, NEW LAW: Changes to Poll Watcher Requirements Under House Bill 3107 and Senate Bill 1, dated February 4, 2022	STATE060559			
19	Election Advisory No. 2022-12, Re: Additional Procedures Regarding Correction of Defects on Application for Ballot by Mail or Carrier Envelope, dated February 11, 2022	STATE001469-73	102		
20	Election Advisory No. 2022-18, Re: Additional Ballot by Mail Procedures for May Uniform Election and Primary Runoff Election, dated April 26, 2022	STATE087955-58	103		US exhibit at STATE087989-92
21	Election Advisory No. 2022-25, Re: November 8, 2022, Election Law Calendar, dated June 20, 2022	STATE122992-3039			
22	Spreadsheet created by Secretary of State in response to media inquiries, listing mail- ballot rejection rates for 2022 elections	STATE115581-616	120	H	
23	Final Report on Audit of 2020 General Election in Texas	STATE115222-580		H	
24	Executive Summary to Audit 2020 General Election in Texas	STATE115212-221		H	
25	Harris County Post Election Assessment of the November 8, 2022, General Election	STATE170230-83	135		
26	Handbook for Election Judges and Clerks, <i>Qualifying Voters on Election Day 2022</i> , Secretary of State, revised July 2022	STATE110976-1056	96		
27	Handbook for Election Judges and Clerks, <i>Early Voting Ballot Board & Signature Verification Committee</i> , Secretary of State, revised July 2022		~93		US exhibit at STATE001325-75
28	Poll Watcher's Guide, Secretary of State, revised January 2022	STATE106313-337			
29	Draft of Poll Watcher Online Training, Secretary of State, January 20, 2022	STATE035175-90		H, R	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
30	Texas Voter Registration Application (Spanish)	STATE046251-52			
31	Texas Voter Registration Application (English)	STATE046253-54	~48		US exhibit at STATE040495
32	Federal Post Card Application		50		
33	Federal Write-In Absentee Ballot				
34	Form 4-20, Certificate of Appointment of Poll Watcher by a Candidate, January 2022.	STATE060813-14			
35	Form 4-21, Certificate of Appointment of Poll Watcher by Political Party, January 2022.	STATE060815-16			
36	Form 4-22, Certificate of Appointment of Poll Watcher for Propositions or Measures, January 2022	STATE060817-16			
37	Form 4-23, Certificate of Appointment of Poll Watcher by Registered Voters on Behalf of a Write-In Candidate, January 2022	STATE060819-20			
38	Form 5-21, Ballot Envelope (For Secrecy), January 2022	STATE061390-91	~18		US exhibit at US00005541-42
39	Form 6-2, Notice of Rejected Application for Ballot by Mail, January 2022	STATE031641-42	19		
40	Form 6-3, Notice of Rejected Application for Ballot by Mail - Missing or Incorrect Personal Identification Numbers, January 2022	STATE031643-44	20		
41	Form 6-4, Notice of Rejected Application for Ballot by Mail - Required Personal Identification Number is Not Associated with Your Voter Record, January 2022	STATE074329-30	21		US exhibit at STATE031645-46
42	Form 6-6, Request to Cancel Application for Ballot by Mail - Early Voting Clerk's Form, January 2022	STATE091410-11	22		US exhibit at STATE001280-81
43	Form 6-11, EVC Notice of Carrier Defect Mailed with Corrective Action Form (Spanish), April 2022	STATE123304-06			

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
44	Form 6-11, EVC Notice of Carrier Defect Mailed with Corrective Action Form (English), April 2022	STATE123307-09	24		US exhibit at STATE087675-77
45	Form 6-12, EVC Notice of Carrier Defect Phone with Corrective Action Form (Spanish), April 2022	STATE123310-12			
46	Form 6-12, EVC Notice of Carrier Defect Phone with Corrective Action Form (English), April 2022	STATE123313-15	25		US exhibit at STATE087681-83
47	Form 6-13, Notice of Surrendered Ballot by Mail, January 2022	STATE034285	26		US exhibit at STATE019840
48	Form 6-14, Corrective Action Form for Defective Carrier Envelope, January 2022	STATE034286	27		US exhibit at STATE019841
49	Form 6-15, Carrier Envelope for Early Voting Ballot (regular ABBM), July 2022	STATE138768-70	28		US exhibit at STATE134228- 30
50	Form 6-17, Information about Returning Your Carrier Envelope, January 2022	STATE074293-94	33		US exhibit at STATE031647-48
51	Form 6-35, Notes for Carrier Envelope (FPCA), January 2022	STATE001634	~37		US exhibit at STATE171171-73
52	Form 6-36, Information about Returning Your Voted Mail Ballot (FPCA Insert), January 2022	STATE031652-53	38		US exhibit at STATE032366-67
53	Form 6-37, Official Election Signature Sheet for an FPCA Voter, December 2021 (English/Spanish)	STATE001643-44	40		US exhibit at STATE040053-54
54	Form 7-33 (AW7-7b), Notice of Voting Order Priority, January 2022	STATE033029			
55	Form 7-58, Oath of Assistance and Interpreter, July 2022	STATE138771-72			
56	Form 7-59, Information of Person that Provided Transportation to Seven or More Voters for Curbside Voting, October 2022	STATE112223			
57	Form 8-15, Notice of Rejected Ballot, January 2022.	STATE152170	42		US exhibit at STATE150492-93

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
58	Form 8-20, Roster of Voters with Defective Carrier Envelopes - Returned to the Voter by Mail, January 2022	STATE034287	43		US exhibit at STATE061142
59	Form 8-21, Roster of ABM Voters with Defective Carrier Envelopes - Notified by Phone or Email, January 2022	STATE034288	44		US exhibit at STATE046360
60	Form 8-22, Roster of FPCA Voters with Defective Carrier Envelopes - Notified by Phone or Email, January 2022	STATE034289	45		US exhibit at STATE019844
61	Form 8-23, Notice of Carrier Defect - Carrier Envelope Returned to the Voter by Mail, January 2022	STATE034290	46		US exhibit at STATE019845-46
62	Form 8-24, Notice of Carrier Defect - Vote Notified of Carrier Envelope Defect by Phone or Email, January 2022	STATE034292	47		US exhibit at STATE019847-48
63	Instructions for Form 9-12, Preliminary Election Reconciliation - Unofficial Totals (Election Day), February 2022	STATE019487-488			
64	Form 9-12, Preliminary Election Reconciliation - Unofficial Totals (Election Day), February 2022	STATE019489			
65	Form 9-13, Election Reconciliation Form - Official Results (Canvass Form) February 2022	STATE019490			
66	Instructions for Form 9-13, Election Reconciliation Form - Official Results (Canvass Form), February 2022	STATE019491-92			
67	January 18, 2022, Email from Election Security Trainer Alexa Buxkemper to Legal Director Christina Adkins, Re: How many forms....	STATE033331-32		H	
68	Carrier Envelope Insert utilized by Denton County to remind voters of ID number requirement	STATE154278	53		US exhibit at STATE151977
69	Carrier Envelope Insert utilized by Travis County to remind voters of ID number requirement	064.134768-69	~57		US exhibit at STATE151937-38
70	Carrier Envelope Insert utilized by Travis County to remind voters of ID number requirement	064.134775-76	~57		US exhibit at STATE151937-38

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
71	ABBM Insert utilized by Travis County to remind voters of ID number requirement	064.134766-67		A	
72	ABBM Insert with Numbers utilized by Travis County to remind voters of ID number requirement	064.134773-74		A	
73	Carrier Envelope Insert utilized by Harris County in 2022 Primaries to remind voters of ID number requirement (English/Spanish)	TATUM_005333-34		A	
74	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Chinese/English)	TATUM_005335-36		A	
75	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Spanish/English)	TATUM_005337-38		A	
76	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Vietnamese/English)	TATUM_005337-40		A	
77	Carrier Envelope Insert utilized by Bexar County in the May 7, 2022, Local Election and May 24, 2022, Primary Runoff to remind voters of ID number requirement		~52	A	US exhibit at US00005549
78	Carrier Envelope Insert utilized by Bexar County in the November 8, 2022, General Election to remind voters of ID number requirement. (Exhibit 13 - February 28, 2023, Dep. of Jacquelyn Callanan)				
79	Carrier Envelope Insert utilized by Hays County to remind voters of ID number requirement	STATE139500-01		A	
80	Carrier Envelope Insert utilized by Kleberg County to remind voters of ID number requirement	STATE142722	54		US exhibit at STATE151559
81	ABBM Insert utilized by Kleberg County to remind voters of ID number requirement	STATE140753		A	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
82	Election Fraud Violations Chart, Office of the Attorney General, updated April 20, 2022	STATE112177-93	~338	H	Bates appears to refer to a version of this chart updated in July 2022. US lists the April 2022 document, marked STATE087323-39
83	Instances of Suspected Illegal Voting Since March 1, 2018 - Cases Opened, Office of the Attorney General	STATE112155-57		H, P, R	
84	Case Tracking Spreadsheet, Election Integrity Unit, Office of the Attorney General	STATE112158-59		A, H, P, R	
85	2020 Complaint Log, Secretary of State	STATE078234		A, H, P, R	
86	2016-2019 Complaint Log, Secretary of State	STATE078237		A, H, P, R	
87	Election Fraud Complaints Referred for Investigation: SOS Referrals, updated May 10, 2022	STATE107717-32		A, H, P, R	
88	March 11, 2021, Email from Director of Government Relations Ryan Fisher at the Office of Attorney General to Jessica Hart; Re: OAG Election Fraud Section	STATE090960	180		
89	Power Point Presentation, <i>Election Integrity</i> .	STATE054622-77	340		
90	Indictment, <i>Texas v. Ward</i> , Cause No. 50947-B	STATE098012-14		H, R	
91	Indictment, <i>Texas v. Jackson</i> , Cause No. 50949-B	STATE097980-98000		H, R	
92	Indictment, <i>Texas v. Burns</i> , Cause No. 50951-B	STATE098008-11		H, R	
93	Indictment, <i>Texas v. Brown</i> , Cause No. 50953-B	STATE098001-07		H, R	
94	Indictment, <i>Texas v. Molina</i> , W-19-0134-J22	STATE098413-18		H, R	
95	Indictment, <i>United States v. Orellana</i> , Case No. 9:18-cr-00020	STATE098510-15		H, R	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
96	Judgment in a Criminal Case, <i>United States v. Orellana</i> , Case No. 9:18-cr-00020	STATE098516-22		H, R	
97	Plea Agreement, <i>United States v. Orellana</i> , Case No. 9:18-cr-00020	STATE098523-32		H, R	
98	Warrant of Arrest, <i>Texas v. Molina</i> , W-19-0134-J22	STATE098537-44		H, R	
99	Agreement, OAG Prosecution Diversion Program, related to illegal voting, signed March 8, 2022	STATE087320		H, R	
100	Agreement, OAG Prosecution Diversion Program, related to unlawful assistance, signed June 6, 2018	STATE087340	342	H	
101	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed October 28, 2021	STATE087342		H, R	
102	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed August 14, 2020	STATE087345		H, R	
103	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed August 19, 2020	STATE087360		H, R	
104	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed June 5, 2018	STATE087365		H, R	
105	Agreement, OAG Prosecution Diversion Program, related to unlawful assistance, signed June 15, 2018	STATE087341	343	H	
106	Agreement, OAG Prosecution Diversion Program, related to failure to sign application as a witness, signed May 19, 2021	STATE087373	344	H	
107	Agreement, OAG Prosecution Diversion Program, related to violations of Tex. Elec. Code §§ 64.012 and 276.013, signed August 5, 2019	STATE087375		H, R	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
108	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018	STATE087376	345	H	
109	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 25, 2018	STATE087377	346	H	
110	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 25, 2018	STATE087380	347	H	
111	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on application for ballot by mail, signed July 25, 2018	STATE087381		H, R	
112	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on application for ballot by mail, signed July 25, 2018	STATE087382		H, R	
113	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed September 17, 2018	STATE087386	348	H	
114	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018	STATE087391	350	H	
115	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018	STATE087392	351	H	
116	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018	STATE087393		H, R	
117	Final Judgment, <i>Rangle v. Rodriguez</i> , NO. 2022CVK001669D1 (49th Dist. Ct., Webb County, Feb. 2, 2023)	STATE184628-37		H, R	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
118	United States' Responses to Texas's First Set of RFPs - Privilege Log			R	
119	November 4, 2013, Press Release from FBI San Antonio Field Office, Re: Former Cameron County Woman Convicted of Voter Fraud	STATE107789		H	
120	June 5, 2014, Press Release from Department of Justice U.S. Attorney's Office Southern District of Texas, Re: Campaign Worker Pleads Guilty To Buying Votes In Donna School Board Election	STATE107844-45		H, R	
121	June 19, 2014, Press Release from Department of Justice, Re: Campaign Manager Charged with Buying Votes in a Donna, Texas, School Board Election	STATE097645-46		H, R	
122	December 1, 2014, Press Release from FBI San Antonio Field Office, Re: Campaign Manager Pleads Guilty to Conspiracy to Buy Votes in a Donna, Texas School Board Election	STATE107785		H, R	
123	House Journal, Eightieth Legislature, Regular Session, Sixtieth Day - Monday April 23, 2007	STATE098214-75			
124	Transcript of Texas Senate Committee on State Affairs, March 18, 2019, Hearing, Re: Senate Bill 9	STATE098545-658			
125	December 3, 2018, Letter from Senator Judith Zaffirini to Senator Bryan Hughes regarding Senate Select Committee on Election Security	STATE108349-50		H, R	
126	Chuck DeVore, <i>The Role of Voter List Maintenance and Voter Identification in Election Integrity</i> , Texas Public Policy Foundation, March 2021	TXLEG_0001066		H, R	
127	July 22, 2020, Letter from Harris County Clerk Chris Hollins to Governor Greg Abbott, Re: Extended Early Voting Days for November 2020 Election	STATE098283		H, R	
128	Governor's Proclamation, dated July 27, 2020, suspending certain statutes	STATE098533-36		R	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
	concerning elections on November 3, 2020				
129	Governor Proclamation, dated October 1, 2020, suspending certain statutes concerning the November 3, 2020, elections			R	
130	Complaint, ECF 1, <i>Tex. League of United Latin Am. Citizens v. Abbott</i> , 493 F. Supp. 3d 548, 567 (W.D. Tex. 2020), vacated sub nom. <i>Tex. League of United Latin Am. Citizens v. Hughs</i> , No. 20-50867, 2021 WL 1446828 (5th Cir. Feb. 22, 2021)			H, R	
131	Justice Devine Dissent, <i>In re Hotze</i> , et al, No. 20-0751, 627 S.W.3d 652 (Tex. 2020)			R	
132	August 25, 2020, Tweet from Harris County Elections about unsolicited ABBMS			A, H, R	
133	August 27, 2020, Letter from Director of Elections Keith Ingram to Harris County Clerk Chris Hollins about unsolicited ABBMs			H, R	
134	Petition, <i>State v. Hollins</i> , NO. 14-20-00627- CV (127th Dist. Ct., Harris County, Tex. Aug. 31, 2020)			H, R	
135	August 31, 2020, Letter from Charles K. Eldred to Seth Hopkins about Rule 11 Agreement in <i>State v. Hollins</i>			H, R	
136	Opinion, <i>State v. Hollins</i> , 620 S.W.3d 400, 403 (Tex. 2020)			R	
137	Webpage, <i>Drive-Thru Voting</i> , HARRIS COUNTY ELECTION DIVISION, https://harrisvotes.com/drivethruvoting	STATE097764-67		A, R	
138	October 16, 2020, Letter from Attorney General Ken Paxton to Texas Election Officials about drive-thru voting			H, R	
139	Petition for Writ of Mandamus, <i>In re Hotze</i> , et al, No. 20-0819, 610 S.W.3d 909 (Tex. 2020)			H, R	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
140	Justice Devine Dissent, <i>In re Hotze, et al.</i> , No. 20-0819, 610 S.W.3d 909 (Tex. 2020)	STATE098278-82		R	
141	Map of 24-Hour Voting Locations in Harris County during November 2020 General Election	STATE097483			
142	Map of Drive Thru Voting Locations in Harris County during November 2020 General Election	STATE097763			
143	September 10, 2020, Email from Elections Division Attorney Charles Pinney to Assistant Director Dan Hayes, Re: Travis County Central Count Accommodations for Poll Watchers	STATE092408-09		H, R	
144	Picture taken of sequestered poll watchers in Travis County's central count during November 2020 General Election			R	
145	Emergency Petition for Writ of Mandamus, <i>In re Mackowiak, et al.</i> , No. 20-0889 (Tex. 2020)	STAT098659-724		H, R	
146	Brief of the Texas Attorney General, <i>In re Mackowiak, et al.</i> , No. 20-0889 (Tex. 2020)	STATE097484-90		H, R	
147	Rule 11 Agreement between Relators and Respondent, <i>In re Mackowiak, et al.</i> , No. 20-0889 (Tex. 2020)	STATE097978-79		H, R	
148	November 11, 2020, Press Release, <i>Travis County Candidate Settles with Travis County Clerk</i> , Martin Harry for District Attorney	STATE098419		H, R	
149	December 8, 2022, Letter from Harris County Election Administrator Clifford Tatum to Secretary of State John Scott, about Countywide Polling Place Program	STATE122932-36		H	
150	Harris County November 6, 2018, General and Special Elections Early Voting Schedule	STATE170226			
151	Harris County November 3, 2020, General and Special Elections Early Voting Schedule	STATE098175-76			

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
152	Harris County Early Voting Polling Location List for November 3, 2020, General and Special Elections	STATE098209-213			
153	Harris County Election Day Polling Location List for November 3, 2020, General and Special Elections	STATE098178-208			
154	Harris County November 8, 2022, General and Special Elections Early Voting Schedule	STATE170227-28			
155	Turnout and Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/70-92.shtml	STATE099276-98			
156	<i>Bee County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/bee.shtml	STATE107733			
157	<i>Bexar County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/bexar.shtml	STATE107734-35			
158	<i>Cameron County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/cameron.shtml	STATE107736- 37			
159	<i>Collin County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/collin.shtml	STATE107738-39			
160	<i>Dallas County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/dallas.shtml	STATE107740-41			
161	<i>Denton County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/denton.shtml	STATE107742-43			

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
162	<i>DeWitt County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/dewitt.shtml	STATE107744			
163	<i>El Paso County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/elpaso.shtml	STATE107745-46			
164	<i>Fort Bend County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/fortbend.shtml	STATE107747-48			
165	<i>Galveston County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/galveston.shtml	STATE107749			
166	<i>Guadalupe County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/guadalupe.shtml	STATE107750-51			
167	<i>Harris County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/harris.shtml	STATE107752-53			
168	<i>Hidalgo County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/hidalgo.shtml	STATE107754-55			
169	<i>Medina County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/medina.shtml	STATE107756			
170	<i>Montgomery County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/montgomery.shtml	STATE107757			

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
	state.tx.us/elections/historical/montgomery.shtml				
171	<i>Starr County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/starr.shtml	STATE107758-59			
172	<i>Tarrant County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/tarrant.shtml	STATE107760-61			
173	<i>Travis County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/travis.shtml	STATE107762-63			
174	2020-2021 Voting Assistance Guide, Texas	STATE115160-75			
175	2022-2023 Voting Assistance Guide, Alabama	STATE115060-65		R	
176	2022-2023 Voting Assistance Guide, Georgia	STATE115074-85		R	
177	2022-2023 Voting Assistance Guide, Florida	STATE115066-73		R	
178	2022-2023 Voting Assistance Guide, Hawaii	STATE115086-91		R	
179	2022-2023 Voting Assistance Guide, Louisiana	STATE115092-99		R	
180	2022-2023 Voting Assistance Guide, Mississippi	STATE115100-07		R	
181	2022-2023 Voting Assistance Guide, New Jersey	STATE115108-13		R	
182	2022-2023 Voting Assistance Guide, New Mexico	STATE115114-19		R	
183	2022-2023 Voting Assistance Guide, North Carolina	STATE115120-29		R	
184	2022-2023 Voting Assistance Guide, North Dakota	STATE115130-35		R	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
185	2022-2023 Voting Assistance Guide, Pennsylvania.	STATE115136-43		R	
186	2022-2023 Voting Assistance Guide, South Dakota	STATE115144-51		R	
187	2022-2023 Voting Assistance Guide, Tennessee	STATE115152-59		R	
188	2022-2023 Voting Assistance Guide, Texas	STATE115176-91	104		
189	2022-2023 Voting Assistance Guide, Virginia	STATE115192-203		R	
190	2022-2023 Voting Assistance Guide, West Virginia	STATE115204-209		R	
191	Webpage, <i>State Laws Governing Early Voting</i> , NATIONAL CONFERENCE OF STATE LEGISLATURES (Aug. 8, 2019)			H, R	
192	List of Amendment to Senate Bill 1, Texas Legislature Online				
193	Enrolled version of House Bill 315. An Act Relating to a Statement by the Secretary of State Regarding the Furnishing of Certain Personal Information on an Application for a Ballot to be Voted by Mail, H.B. 315, 88th Leg., R.S. (2023)	STATE182552-55			
194	Enrolled version of House Bill 3159. An Act Relating to the Use of an Accessible Absentee Mail System by Certain Voters, H.B. 3159, 88th Leg., R.S. (2023)	STATE182586-91			
195	Enrolled version of House Bill 357. An Act Relating to the Requirements to Access the Online Tracker of an Application for a Ballot to be Voted by Mail and to the Date of Runoff Elections, H.B. 357, 88th Leg., R.S. (2023)	STATE182637-40	7		
196	Enrolled version of Senate Bill 1052. An Act Relating to the Compensation of an Election Judge or Clerk, S.B. 1052, 88th Leg., R.S. (2023)	STATE182661-62			

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
197	Enrolled version of Senate Bill 1599. An Act Related to Ballots Voted by Mail, S.B. 1599, 88th Leg., R.S. (2023)	STATE182732-43	6		
198	Enrolled version of Senate Bill 477. An Act Relating to Accommodating Voters with a Disability, S.B. 477, 88th Leg., R.S. (2023)	STATE182774-78			
199	Enrolled version of Senate Bill 975. An Act Relating to the Procedures for the Issuance of a Personal Identification Certificate to a Person Whose Driver's License is Surrendered, S.B. 975, 88th Leg., R.S. (2023)	STATE182805-06	9		US exhibit at US00007914-15
200	Expert Witness Report, Prof. Eitan Hersh, <i>Second Supplement to Report on Identification Number Requirements for Mail Balloting under SB 1.</i> (Served on Feb. 10, 2023)	US00007385-10	146		
201	Expert Witness Report, Prof. Eitan Hersh, <i>Addendum to Second Supplement to Report on Identification Number Requirements for Mail Balloting under SB 1.</i> (Served on May 8, 2023)	US00007377-84	147		
202	Election Advisory No. 2022-13, Certain Activities in Vicinity of Polling Places, dated February 14, 2022	STATE001463-67			
203	Election Advisory No. 2022-02, Instructions and Deadlines for Mailing/Emailing Ballots Under the Federal "MOVE Act" for Overseas Voters, dated January 10, 2022	STATE124074-79	99		US exhibit at STATE040059-64
204	Election Advisory No. 2021-14, Re: Impact of Redistricting on Certain Election Deadlines and Procedures, dated November 1, 2021.	STATE001477-82			
205	Election Advisory No. 2021-10, Re: NEW LAW: SB 1111 (2021, Regular Session) Address Confirmation Process and Forms, dated August 31, 2021	STATE098870-72			

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
206	Election Advisory No. 2021-09, Re: 2021 Legislative Summary - 87 th Regular Session, dated July 30, 2021	STATE098864-69			
207	Election Advisory No. 2021-08, Re: November 2, 2021, Election Law Calendar - Last Updated: June 2021	STATE097826-859			
208	Election Advisory No. 2020-27, Re: Minority Language Requirements, dated September 7, 2020	STATE097824-25			
209	Election Advisory No. 2020-17, Re: November 3, 2020, Election Law Calendar - Updated August 2020	STATE097791-823			
210	Election Advisory No. 2019-09, Re: Minority Language Requirements, dated June 25, 2019	STATE097788			
211	Form 5-6, Roster for Voters Hand-Delivering Carrier Envelope, January 2022	STATE046603			
212	Form 5-16, Application for Emergency Early Voting Ballot due to Death in the Family, January 2022	STATE138843-44	16		US exhibit at STATE138167-68
213	Form 5-18, Application for Emergency Early Voting Ballot Due to Sickness or Physical Disability, January 2022	STATE138169-70	17		
214	Instructions for Form 5-18, Application for Emergency Early Voting Ballot Due to Sickness or Physical Disability, January 2022	STATE138054			
215	Form 5-19, Application for Emergency Early Voting Ballot Board Due to Sickness or Physical Disability: Instructions for Voter after Marking the Ballot, January 2022	STATE138171			
216	Form 5-16(b), Request for Updated Annual Application for Ballot by Mail, prescribed by the Secretary of State, October 2022	STATE185506-07			
217	Form 6-15, Carrier Envelope for Early Voting Ballot, May 2022	STATE123087-89	29		US exhibit at STATE132937-39

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
218	Instructions for Form 6-15, Carrier Envelope for Early Voting Ballot, May 2022.	STATE123085			
219	September 27, 2022, Email from Director of Elections Keith Ingram to Joyce LeBombard, League of Women Voters, Re: Two More Quick Questions	STATE140777-79		H	
220	December 9, 2021, Email from Deputy Director J. Scott Wiedmann, Federal Voting Assistance Program, to Legal Director Christina Adkins, Re: RE: [Non- DoD Source] Questions on Carrier Envelopes for FPCA voters	STATE031889-90		H	
221	February 1, 2022, Email from Elections Division Attorney Melanie Best and Christina Obermiller, Department of Defense, Federal Voting Assistance Program, Re: FPCA ID Question - FVAP/Obermiller	STATE04893-94	234	H	
222	April 19, 2022, Mass Email from Elections Division Attorney Heidi Martinez to Election Officials, Re: Forms Release 4/19/2022	STATE123303	278		US exhibit at STATE087671
223	July 7, 2022, Mass Email from Director of Elections Keith Ingram to Election Officials, Re: Notice of Court Order and Revised Election Forms	[STATE]123318-19		H	
224	August 25, 2022, Mass Email from Secretary of State's Elections Internet account to Election Officials, Re: Important Information for the November 8, 2022, General Election	STATE124342-44		H	
225	September 21, 2022, Mass Email from Secretary of State's Elections Internet account to Election Officials, Re: Updated Forms and Resources - Notice of Court Order and Revised Election Forms	STATE138776-78		H	
226	October 11, 2022, Mass Email from Legal Director Christina Adkins to Election Officials, Re: Reminder - Webinar Today	STATE124636-39		H	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
227	Request for Proposal, <i>Voter Education and Outreach Opportunities for 2022 Elections</i> , Secretary of State	STATE137757-837	115	H	
228	Report to the 88th Legislature on the Implementation of Educational Programs to Help Voters with Disabilities Understand How to Use Voting Systems Used in the State of Texas	STATE137752-56	12	H, R	
229	September 8, 2022, Press Release, <i>SOS 101: Voter Registration in Texas</i> , Texas Secretary of State Press Office	STATE120522-25		H	
230	October 12, 2022, Press Release, <i>SOS 101: Voting by Mail in Texas</i> , Texas Secretary of State Press Office	STATE119692-98	335		
231	September 20, 2022, Press Release, <i>Secretary Scott Marks National Voter Registration Day, Highlights Statewide 'VoteReady' Voter Education Campaign</i> , Texas Secretary of State Press Office	STATE120634-41	334		
232	November 7, 2022, Press Release, <i>What to Expect on Election Day in Texas</i> , Texas Secretary of State Press Office	STATE122811-15		H	
233	February 9, 2022, Email from Assistant Secretary of State for Communications Sam Taylor to Director of Elections Keith Ingram, Re: Correction to CNN story - incorrect information about new vote by mail ID requirement	STATE046882-84		H	
234	Webpage, <i>Voters with Special Needs</i> , EPCOUNTYVOTES.COM, https://epcountyvotes.com/voter_information/voters_with_special_needs .	STATE170217-19		A	
235	Notice to Voters with Disabilities, Harris County	STATE170319		A	
236	Webpage, <i>Services Available to Voters with Disabilities in Texas</i> , VOTETEXAS.GOV, https://www.votetexas.gov/voters-with-special-needs/	STATE099301-04		A	
237	Webpage, <i>FPCA Ballot Tracker</i> , TEXAS SECRETARY OF STATE,	STATE170224-25		A	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
	https://web.services.sos.state.tx.us/FPCA/index.aspx				
238	Handbook for Election Judges and Clerks, <i>Qualifying Voters on Election Day 2022</i> , Secretary of State, revised January 2022	STATE034699-779	95		US exhibit at STATE001377-57
239	Poll Watcher's Guide, Secretary of State, revised January 2022	STATE106313-37			Appears duplicative of Exhibit 28
240	Travis County Poll Worker Training Manual	64.134855			
241	Harris County Election Manual 2022-2023	STATE170320-527			
242	Frequently Asked Questions: Voting in Person	TATUM_005680			
243	Power Point Presentation, <i>Poll Watchers</i> , County Election Officials Election Law Seminar, July 2018	STATE085635-41			
244	Power Point Presentation, <i>Communicating Legislative Changes: ID Requirements for Voting by Mail</i> , NASED Presentation, Secretary of State, February 2023	STATE177246-68	91	H	US exhibit at STATE174015-37
245	Power Point Presentation, <i>SOS Updates 2021</i> , Secretary of State	STATE075496			
246	Power Point Presentation, <i>Elections 101</i> , Secretary of State, July 2020	STATE085183-232			
247	Power Point Presentation, <i>Early Voting in Person Changes</i> , Secretary of State	RFP14_000071			
248	Power Point Presentation, FAQs on Applications for Ballot by Mail (ABBMs), Secretary of State	STATE061321-24	73		US exhibit at STATE001713-43
249	Power Point Presentation, <i>Election Reconciliation-Official Totals</i> , Webinar, Secretary of State, March 2022	STATE019553-72			
250	Power Point Presentation, <i>Election Reconciliation Forms</i> , Webinar, Secretary of State, April 2022	STATE087830-66			

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
251	Power Point Presentation, <i>Election Reconciliation Forms</i> , Webinar, Secretary of State, October 2022	STATE112370-414			
252	Power Point Presentation, <i>Opportunity to Correct Defects on Application for Ballot by Mail and Carrier Envelope</i> , Secretary of State, February 2022	STATE059522-557	74		US exhibit at STATE044166-01
253	Power Point Presentation, <i>Training for EVBB/SVC Members on New Ballot by Mail Procedures</i> , Secretary of State, April 2022	STATE124844-94	82		
254	Power Point Presentation, <i>Update from SOS</i> , Secretary of State, August 2022.	STATE111746-83		R	
255	Power Point Presentation, <i>Training for EVBB/SVC Members on New Ballot by Mail Procedures: General Election for State and County Officers</i> , Secretary of State, October 2022	STATE124640-65	88		
256	Power Point Presentation, <i>Proactive Communication Strategies for Local Election Officials</i> , Secretary of State, Election Seminar, Secretary of State, November 2022	STATE148646-70		H	
257	Power Point Presentation, <i>Election Forms</i> , Election Seminar, Secretary of State, December 2022	STATE114273-351			
258	Online Poll Worker Training Program, Secretary of State, January 6, 2016	STATE081477-98		A, H, R	
259	2020 Election Administration and Voting Survey, U.S. Election Assistance Commission. (Exhibit 8 - April 7, 2023, Dep. of Tammy Patrick)		141		
260	2020 EAVS Manual, U.S. Election Assistance Commission	STATE050649-92			
261	2018 Election Administration and Voting Survey, U.S. Election Assistance Commission	STATE114809 - 5059	142		
262	2016 Election Administration and Voting Survey, U.S. Election Assistance Commission. (Exhibit 6 - April 7, 2023, Dep. of Tammy Patrick)		143		

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
263	2014 EAC Election Administration and Voting Survey Comprehensive Report, U.S. Election Commission	STATE114498-808			
264	2010 Election Administration and Voting Survey, U.S. Election Assistance Commission	STATE114377 - 497			
265	Travis County Early Voting Locations for November 3, 2020, General Election	STATE098965		A	
266	Travis County Election Day Vote Centers for November 3, 2020, General Election	STATE098974-76		A	
267	Travis County Early Voting Locations for March 1, 2022, Primary Election	STATE098963		A	
268	Travis County Election Day Vote Centers for March 1, 2022, Primary Election	STATE098966-68		A	
269	Travis County Early Voting Locations for May 7, 2022, Local Elections	STATE098964		A	
270	Travis County Election Day Vote Centers for May 7, 2022, Local Elections	STATE098969-71		A	
271	Kerr County Polling Locations for November 8, 2022, General Election	STATE170292		A	
272	Election Reconciliation Form for November 8, 2022, General Election, Travis County	64.134709			
273	Preliminary Election Reconciliation - Unofficial Totals for March 1, 2022, Primary Elections, Harris County				
274	Election Reconciliation Form for March 1, 2022, Democratic Primary Election, Harris County				
275	Election Reconciliation Form for March 1, 2022, Republican Primary Election, Harris County				
276	Election Reconciliation Form for November 8, 2022, General Election, Harris County.	TATUM_005330			

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
277	Election Reconciliation Form for November 8, 2022, General Election, Harris County.	STATE170229			
278	Harris County Community Partnership Presentation.	TATUM_005753			
279	Reference Manual & Checklist April 2022, Harris County.	STATE098019-174		A	
280	Poll Worker Training November 8, 2022, General Election, Hays County	STATE181404-45		A	
281	Webpage, <i>Countywide Vote Centers Information</i> , DALLASCOUNTYVOTES.ORG, https://www.dallascountvotes.org/countywide-polling-places	STATE097760-62			
282	Declaration of Brian Keith Ingram, ECF 43-1, <i>Tex. League of United Latin Am. Citizens v. Abbott</i> , 493 F. Supp. 3d 548, 567 (W.D. Tex. 2020), vacated sub nom. <i>Tex. League of United Latin Am. Citizens v. Hughs</i> , No. 20-50867, 2021 WL 1446828 (5th Cir. Feb. 22, 2021)	STATE098337-40		H, R	
283	Reporters Record, Vol. 2 of 3, October 13, 2020, Hearing on Plaintiff's Application for Temporary Injunction and Defendants Plea to the Jurisdiction, <i>Anti-Defamation League Austin, Southwest, and Texoma Regions v. Abbott</i> , Cause No. D-1-GH-20-005550	STATE098977-275		H, R	
284	Appellant's Brief, <i>Abbott v. Anti-Defamation League Austin, Southwest, and Texoma Regions</i> , Appellate Cause No. 03-20-00498- CV, 2020 WL 6586318 (Tex. App.-Austin)	STATE097491-600		H, R	
285	Appellant's Reply Brief, <i>Abbott v. Anti-Defamation League Austin, Southwest, and Texoma Regions</i> , Appellate Cause No. 03- 20-00498- CV (Tex. App.-Austin)	STATE097601-40		H, R	
286	Order, ECF 63, <i>Hotze v. Hollins</i> , No. 4:20- CV-03709, (S.D. Tex. Nov. 2, 2020), aff'd in part, vacated in part sub			R	

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
	nom. Hotze v. Hudspeth, 16 F.4th 1121 (5th Cir. 2021). (Exhibit 12 - May 6, 2022, Dep. of Chris Hollins)				
287	John Burnett & Marisa Peñaloza, <i>In Rio Grande Valley, Some Campaign Workers Are Paid To Harvest Votes</i> , NPR (July 7, 2015)	STATE107793-808		H, P	
288	Tim Acosta, <i>Judge tosses Kleberg County justice of the peace votes, orders new election</i> , CALLER TIMES (June 26, 2018)	STATE107811-13		H	
289	Tim Acosta, <i>Robstown resident pleads guilty to voter fraud, barred from helping in future elections</i> , CALLER TIMES (June 14, 2018)	STATE107836-37		H	
290	U.S. Census Bureau's Quick Facts: Harris County, Texas, population estimate July 1, 2021. (Exhibit 46 - October 6, 2022, Dep. of Sen. Carol Alvarado)			A	
291	Risk for COVID-19 Infection, Hospitalization, and Death by Race/Ethnicity, CENTER FOR DISEASE CONTROL AND PREVENTION (Apr. 7, 2023), https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html	STATE170541		R	
292	Report of the Commission on Federal Election Reform, <i>Building Confidence in U.S. Elections</i> , September 2005	STATE097647-759		H	
293	Transcript of Texas Senate Committee on State Affairs (Part I), August 9, 2021, Hearing, Re: Senate Bill 1	STATE154280-302			
294	Transcript of Texas Senate Committee on State Affairs (Part [II]), August 9, 2021, Hearing, Re: Senate Bill 1	STATE154831-77			
295	Transcript of Texas Senate Session (Part I), August 11, 2021, Re: Senate Bill 1	STATE156017-125			
296	Transcript of Texas Senate Session (Part II), August 11, 2021, Re: Senate Bill 1	STATE156701-837			

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
297	Transcript of Texas House Committee on Constitutional Rights and Remedies (Part I), August 23, 2021, Re: Senate Bill 1	STATE160198-358			
298	Transcript of Texas House Committee on Constitutional Rights and Remedies (Part II), August 23, 2021, Re: Senate Bill 1	STATE162405-462			
299	Transcript of Texas House of Representatives Session (Part I), August 26, 2021, Re: Senate Bill 1	STATE163200-286			
300	Transcript of Texas House of Representatives Session (Part II), August 26, 2021, Re: Senate Bill 1	STATE165397-451			
301	Transcript of Texas House of Representatives Session (Part I), August 27, 2021, Re: Senate Bill 1	STATE166756-772			
302	Transcript of Texas House of Representatives Session (Part II), August 27, 2021, Re: Senate Bill 1	STATE167151-54			
303	Transcript of Texas Senate Session, August 27, 2021, Re: Senate Bill 1	STATE167176-179			
304	Transcript of Texas House of Representatives Session, August 31, 2021, Re: Senate Bill 1	STATE167201-07			
305	Transcript of Texas Senate Session, August 31, 2021, Re: Senate Bill 1	STATE167300-328			
306	2022 P22 App Rejections (Includes Voters that Cured Rej).xlsx	64.127324			
307	Summary Exhibit - ABBM application and ballot numbers- 20220325T005810Z-001.zip?ABBM application and ballot numbers\a_reqexpPM22_full.txt	LUPE_0007719			No summary exhibit was produced. Reserve objections.
308	ABBM application and ballot numbers - 20220325T005810Z-001.zip?ABBM application and ballot numbers\a_reqexpPM22_full.txt	LUPE_0007719		A	
309	Summary Exhibit - REDACTED - _P322_1_Dallas.xlsx	LUPE_0007734			No summary exhibit was

#	Exhibit	Bates Range	US #	Objection	Notes/US Bates
					produced. Reserve objections.
310	REDACTED_-_P322_1_Dallas.xlsx	LUPE_0007734		A	
311	Summary Exhibit - a_reqexpPM22_full.txt	LUPE_0024430			No summary exhibit was produced. Reserve objections.
312	a_reqexpPM22_full.txt	LUPE_0024430		A	
313	Summary Exhibit - P322_Election.xlsx	HJ_0008945			No summary exhibit was produced. Reserve objections.
314	P322_Election.xlsx	HJ_0008945		A	
315	January 31, 2017, Letter on Results of Audit of November 8, 2016, General Election from Gretchen Nagy, Director, Travis County Voter Registration to Michael Winn, Director, Travis County Clerk Elections Division			H, P	

Date: August 15, 2023